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July 15, 2025

VIA ECF

Honorable Chief Judge Renée Marie Bumb  
United States District Court  
District of New Jersey  
Mitchell H. Cohen Courthouse  
4th & Cooper Streets, Courtroom 3D  
Camden, NJ 08101

**Re: *Freedom Mortgage Corp. v. LoanCare, LLC*,  
Civil Action No. 1:16-CV-2569 (RMB/AMD)**

Dear Chief Judge Bumb:

On behalf of both Plaintiff-Counterclaim Defendant Freedom Mortgage Corporation (“Freedom”) and Defendant-Counterclaimant LoanCare, LLC (“LoanCare” and, together with Freedom, the “Parties”), we are pleased to report that the Parties have agreed to settle the above-referenced action (the “Action”), resolving it and Freedom’s related appeal on a confidential basis, with prejudice and without costs. Earlier today, the Parties dismissed the appeal, pursuant to their stipulation. The Parties now jointly request that, in furtherance of the Parties’ settlement, the Court maintain the in-effect administrative termination of this Action until such time as, upon the occurrence of certain events contemplated by the settlement agreement within the next two years, (i) LoanCare files documents with the Court in which (a) the Parties each acknowledge the adequate satisfaction of the Judgment in a Civil Case (ECF No. 370), as amended by the Amended Final Judgment (ECF No. 420) and (b) LoanCare withdraws its motion for attorneys’ fees and expenses (ECF No. 386) with prejudice and the Parties jointly request that the Action be closed or, in the event that LoanCare does not timely file such documents pursuant to the Parties’ settlement, (ii) Freedom moves the Court for such equivalent relief.

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Honorable Chief Judge Renée Marie Bumb  
July 15, 2025  
Page 2

The Parties appreciate Your Honor's consideration of this joint request and continued attention to this Action.

Respectfully submitted,

*/s/ Brad D. Feldman*

Brad D. Feldman

cc: All counsel of record (via ECF)